

**The Bay Institute  
Metropolitan Water District of Southern California  
Natural Heritage Institute  
The Nature Conservancy**

January 25, 1999

Lester Snow, Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

**RE: ECOSYSTEM RESTORATION PROGRAM PLAN**

Dear Lester,

We are writing to express our concerns regarding the continuing development of the CALFED Program's Ecosystem Restoration Program Plan (ERPP), and to offer some recommendations to help ensure further progress in a timely and efficient manner.

As you know, we have invested considerable time and resources in working with CALFED staff and others to improve the Ecosystem Restoration Program Plan (ERPP). As you will remember, we worked closely with CALFED staff on the design of the successful initial meeting of the independent scientific review panel, which drew on the expertise of a broad advisory body of local scientists (Tier 2). More recently, we were extremely pleased when the Program adopted our recommendation to commission an independent scientific work team (core team) to produce a strategic plan for ecosystem restoration. The resulting draft strategic plan issued last year represented an impressive and exciting first step in providing a sound conceptual framework for implementing what may be the most ambitious restoration program ever contemplated.

We are concerned, however, not only with the subsequent lack of progress in following up on the success of this first step, but with the erosion of that success. Over the last few months, CALFED staff have focused on editing and rearranging the draft strategic plan. This effort has substantially weakened the original document, particularly in eliminating the quantification of ecosystem goals and objectives, in weakening the linkages between Program objectives and proposed Stage 1 actions, and in modifying the criteria for selecting Stage 1 actions. These changes should be remedied in future revisions of the plan.

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Of equal significance is the fact that the Program has lost considerable time that should have been devoted to the more pressing tasks of completing the strategic plan and applying its framework to further development of the ERPP as a whole, as well as related CALFED efforts.

We urge the Program to provide adequate funding and staff support to reinvigorate the three-tiered process (core team/standing scientific advisory body/independent scientific review panel) we recommended over a year ago in order to address the following needs:

1. Quantifying objectives: the original draft established quantitative objectives for restoring populations of many native and other desirable species, but failed to establish quantitative objectives for restoring many habitats, ecological processes, and biotic communities. While developing a comprehensive suite of quantified objectives and indicators for all ecosystem restoration goals may not be feasible at present, the core team should work with Tier 2 (which needs to be re-established by CALFED) and CMARP to quantify a "core" suite of objectives and indicators that address restoration at the landscape, ecological zone, community, and habitat levels, and to provide guidance for future development of a more comprehensive suite of objectives and indicators.
2. Adaptive management: the original draft established a beginning framework for setting priorities and testing hypotheses in the selection of restoration measures for initial implementation, and considered a specific example of adaptive management. Additional work is needed to develop the linkages between the suite of program objectives and the suite of priority actions; to provide a more detailed template for how hypothesis testing should be embedded in the design and implementation of restoration actions as appropriate, and consider a broader range of examples; and to explain how performance assessment and monitoring should be used to guide ongoing implementation of the program. The core team should work with Tier 2, CMARP and CALFED staff to address these needs.
3. Coordination of restoration planning activities: the strategic planning process was always envisioned as the "operating instructions" for the restoration program. It was intended to provide overall guidance to CALFED's restoration planning efforts, which include the selection of short-term restoration measures (Roundtable process), the identification of Stage 1 Delta management measures (Diversion Effects on Fisheries [DEFT]), the development of performance assessment and monitoring criteria (CMARP), and the completion of a comprehensive menu of desirable, potentially implementable restoration actions for environmental review (the ERPP). The role of the three-tiered process (core

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team/Tier II/independent review panel) in providing guidance and oversight to the Roundtable panels (on priority setting and hypothesis testing), DEFT members (on priority setting and hypothesis testing), CMARP participants (on performance metrics), and CALFED staff (on review and revision of the ERPP as a whole) needs to be clearly defined, reinvigorated, and assured.


In conclusion, we believe that addressing these needs will require sustained effort by the core team, with continuous participation by Tier 2 and CMARP, and sufficiently frequent, appropriately timed, independent scientific review. The Program should immediately commit to retain the core team and to re-establish the Tier 2 advisory body to complete the strategic plan, and secure a budget to support that commitment.

We also believe that CALFED must work harder to ensure that the substantial work performed by independent work teams to produce a scientifically rigorous product are not inappropriately modified. For instance, future revisions should include a transparent, easily understandable comparison of all changes to independent work team products, and that any substantive changes should be brought to the attention of stakeholders and considered at the technical or policy level as appropriate. A review and revision process which allows for greater interaction between the core team and CALFED staff would also help expedite completion of the plan.


Finally, it may be desirable to defer the next meeting of the independent scientific review panel until completion of the strategic plan, greater integration with the CMARP plan and other initiatives, and completion of the other tasks we have identified.

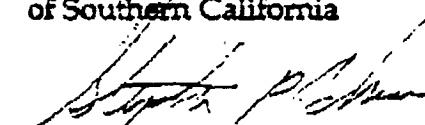
We request a meeting with CALFED staff to discuss how these recommendations could be implemented.

Sincerely,

  
Gary Bobker  
The Bay Institute

  
John R. Cain  
Natural Heritage Institute

  
Peter B. Rhoads  
Metropolitan Water District of  
of Southern California

  
Steve Johnson  
The Nature Conservancy